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May 19, 2020

The Honorable John K. Sherwood
U.S. Bankruptcy Court
MLK, Jr. Federal Building
50 Walnut St., 3rd Floor
Newark, New Jersey

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OF COUNSEL

Re: In re: New England Motor Freight, Inc., et al. (Docket No. 19-12809-JKS)

<u>GEICO (Michael Singley) v. NEMF</u> Date of Loss 3/15/17 Baldwin Lyons file -ZA 18375 Our file G170315G WH	<u>GEICO (Carlos Diaz) v. NEMF</u> Date of Loss April 5, 2017 Baldwin Lyons file - ZA 18603 Our file G170405I WH
<u>GEICO (Tomas Arocho) v. NEMF</u> Date of Loss March 1, 2018 Baldwin Lyons file - ZA 20621 Our file G180301G WH	<u>GEICO a/s/o Kenneth Fersch v NEMF</u> Date of Loss October 28, 2016 Wilson Elser file 21991.00047 Our file G181026G WH

Dear Judge Sherwood:

This office represents GEICO in connection with four (4) auto liability claims arising from motor vehicle accidents with New England Motor Freight ("NEMF") vehicles.

These four claims, referenced above, are subject to the auto claims protocol adopted in this bankruptcy matter. We have attempted informal negotiations with Scott Blevins of Baldwin and Lyons, third party administrator ("TPA") for NEMF, as well as Joanna Garelick Goldstein, Esq. and Brian Matthews, Esq. of the Law Firm of WilsonElser counsel to NEMF. However, the claims have failed to resolve.

Please accept this letter as a **Mediation Request** pursuant to the auto liability protocol.

I have sent email copies of this request to all persons listed below. Please advise if there are any other parties which need to be noticed of our request.

It is our understanding that the above matters will be automatically referred for mandatory, non-binding mediation.

If there is anything further required, please feel free to contact me by phone (973) 467-8080 or email whahn@tdlmm.com.

Thank you for your time and attention to this matter.

Very truly yours,

Tango, Dickinson, Lorenzo,
McDermott & McGee, LLP


William Hahn

WH/ss

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